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July 15, 2025

Via ECF

The Hon. Lewis Liman
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 15C
New York, NY 10007

Re: *Legacy Restoration, LLC (“Legacy”) vs. Oswaldo “Junior” Barajas, et al.* - Case Number 1:25-CV-05319

Dear Judge Liman:

We write on behalf of Legacy with respect to the motion to disqualify counsel (the “Motion”) filed today by Defendants in connection with Legacy’s request to enter a preliminary injunction against Defendants Barajas and USA Contracting Co, LLC.

Less than thirty-six hours before the evidentiary hearing scheduled for Wednesday, July 16, 2025, Defendants have filed a motion to disqualify Margaret Hope Allen and the law firm of Sidley Austin LLP. Defendants’ motion could have been brought weeks ago.

Legacy respectfully requests the opportunity to brief a response to the Motion. In this regard, Legacy respectfully requests that it be permitted to file a response on Monday, July 21, 2025, and that the Court adjourn the hearing scheduled for July 16 and extend the temporary restraining order entered on June 26 against Oswaldo “Junior” Barajas for good cause pending resolution of the Motion. This short extension and adjournment will allow the parties and the Court sufficient time to address the issues raised in the Motion.

Respectfully submitted,

/s/ Melissa Colón-Bosolet
Melissa Colón-Bosolet
Margaret Hope Allen
Counsel for Legacy Restoration, LLC

cc: All counsel (via ECF)